

Louisville Metro Air Pollution Control District
850 Barret Ave., Louisville, Kentucky 40204
17 April 2012

Title V Statement of Basis

Company: Ford Motor Company-Kentucky Truck Plant

Plant Location: 3001 Chamberlain Lane, Louisville, Kentucky 40241

Date Application Received: 18 February 2011
31 January 2005

Application Numbers: 11778,
10456,
10980

Date of Draft Permit: 02/22/2012

District Engineer: Shannon Hosey

Permit No: 150-97-TV (R1)

Plant ID: 0073

SIC Code: 3711

NAICS: 336112

AFS: 00073

Introduction:

This permit will be issued pursuant to: (1) Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for lead (Pb), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), 1 hr and 8 hr ozone (O₃), and particulate matter less than 10 microns (PM₁₀); and is a non-attainment area for particulate matter less than 2.5 microns (PM_{2.5}).

Application Type/Permit Activity:

- ☐ Initial Issuance
- ☐ Permit Revision
 - ☐ Administrative
 - ☐ Minor
 - ☐ Significant
- ☒ Permit Renewal
- ☐ Construction

Compliance Summary:

- | | |
|---|---|
| <input checked="" type="checkbox"/> Compliance certification signed | <input type="checkbox"/> Compliance schedule included |
| <input type="checkbox"/> Source is out of compliance | <input checked="" type="checkbox"/> Source is operating in compliance |

I. Source Information

1. **Product Description:** Manufacture of automobiles.
2. **Process Description:** Vehicle bodies are assembled in the body shop and then primed in the paint shop. A variety of sealers are applied to the bodies which are then painted (additional primer and topcoat). Wax is applied to certain body parts. Next, windshields and back lights are installed, then a structural adhesive is used to bond glass to the bodies.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.
4. **Emission Unit Summary:**

Emission Unit	Equipment Description
U-00	Natural Gas Boilers
U-11	Volatile Organic Liquid Storage Tanks
U-12	Plant-wide Product Fueling and Plant Vehicle Refueling
U-15	Phosphate System
U-16	E-Coat Operation
U-17	Sealer
U-18	Guidecoat Operation
U-19	Topcoat/Final Repair Operations
U-20	Black-Out and Wax
U-22	Cleaning Operations
U-28	Aluminum Scrap System
U-29	Mobile Equipment Maintenance Booth (ITR)
U-30/U-33	Two (2) Windshield Installation Operations
U-31	Bedliner Coating Booth
U-32	Blank Wash Process Operation
U-34	Natural Gas-Fired Combustion Equipment - Non-Boiler
U-35	Emergency Generators

5. **Fugitive Sources:** There are no significant fugitive emissions.

6. Permit Revisions:

Revision No.	Issue Date	Public Notice Date	Type	Attachment No./Page No.	Description
N/A	08/24/2000	05/21/2000	Initial	Entire Permit	Initial Permit Issuance
R1	04/17/2012	02/22/2012	Initial/ Renewal	Entire Permit	5 year Renewal; Incorporate PAL, STAR TAC requirements, RO change, construction permits 63-04-C, 65- 04-C, 118-04-C, 119- 04-C, 210-05-C, 211- 05-C, 157-07-C, 158- 07-C, 479-08-C, 567- 08-C and 583-08-C

7. Emission Summary:

Pollutant	Actual Emissions (tpy) 2010 Data	Pollutant that triggered Major Source Status(based on PTE)
CO	55.46	Yes
NO _x	66.03	Yes
SO ₂	0.40	No
PM	13.95	No
VOC	591.56	Yes
Single HAP > 1 tpy		
Glycol Ethers	2.54	Yes
Hexane	1.21	Yes
Naphthalene	1.63	Yes
Ethylbenzene	2.97	Yes
Toluene	1.73	Yes
Xylene	13.29	Yes
Total HAPs	25.28	Yes

8. Applicable Requirements:

☒ PSD ☒ NSPS ☒ SIP ☒ MACT
☐ NSR ☐ NESHAPS ☒ District-Origin ☐ Other

9. Future MACT Requirements: There are no future MACT requirements.**10. Referenced Federal Regulations in Permit:**

40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
40 CFR 60 Subpart MM	National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations
40 CFR 63 Subpart EEEE	Organic Liquids Distribution Operations
40 CFR 63 Subpart IIII	National Emission Standards for Hazardous Air Pollutants – Surface Coating of Automobile and Light Duty Trucks
40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR 63 Subpart DDDDD	Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
40 CFR Part 64	Compliance Assurance Monitoring

II. Regulatory Analysis

1. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
2. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.
3. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical*

Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount.

4. Basis of Regulation Applicability

Regulation	Title	Type
1.05	Compliance with Emission Standards and Maintenance Requirements	SIP
1.09	Prohibition of Air Pollution	SIP
2.04	Construction or Modification of Major Sources In or Impacting Upon Non-Attainment Areas (Emission Offset Requirements)	SIP
2.16	Title V Operating Permits	SIP
5.0	Definitions	Local
5.01	General Provisions	Local
5.14	Hazardous Air Pollutants and Source Categories	Local
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	Local
5.21	Environmental Acceptability for Toxic Air Contaminants	Local
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	Local
5.23	Categories of Toxic Air Contaminants	Local
6.07	Standards of Performance for Existing Indirect Heat Exchangers	SIP
6.17	Standard of Performance for Existing Automobile and Truck Surface Coating Operations	SIP
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	SIP
6.42	Reasonable Available Control Technology Requirements for Major Volatile Organic Compound	SIP
7.02	Federal New Source Performance Standards Incorporated by Reference	SIP
7.06	Standards of Performance for New Indirect Heat Exchangers	SIP
7.08	Standards of Performance for New Process Operations	SIP
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	SIP
7.15	Standards of Performance for New Process Operations	SIP
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	SIP
7.59	Standards of Performance for New Source Using Volatile Organic Compounds	SIP
7.79	Standards of Performance for New Commercial Motor Vehicle and Mobile Equipment Refinishing Operations	SIP
40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units	Federal
40 CFR 60 Subpart MM	National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations	Federal
40 CFR 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	Federal
40 CFR 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	Federal
40 CFR 63 Subpart EEEE	Organic Liquids Distribution Operations	Federal

Regulation	Title	Type
40 CFR 63 Subpart IIII	National Emission Standards for Hazardous Air Pollutants – Surface Coating of Automobile and Light Duty Trucks	Federal
40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	Federal
40 CFR 63 Subpart DDDDD	Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	Federal

a. Plant-wide

The source is subject to a PAL limit of 920.35 tons of VOC during any consecutive 12-month period.

The source is subject to a PAL limit of 50.5 tons of PM during any consecutive 12-month period.

The source is subject to a PAL limit of 50.5 tons of PM₁₀ during any consecutive 12-month period.

The source is subject to a PAL limit of 45.05 tons of PM_{2.5} during any consecutive 12-month period.

The source is subject to a PAL limit of 99 tons of NO_x during any consecutive 12-month period.

The source is subject to a PAL limit of 39.58 tons of SO₂ during any consecutive 12-month period.

The source is subject to a PAL limit of 180.66 tons of CO during any consecutive 12-month period.

Regulations 5.01, 5.21, and 5.23 (STAR Program) establishes requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards.

The owner or operator shall not allow any TAC emissions to exceed environmentally acceptable levels whether specifically established by modeling or derived from default *de minimis* levels. (Regulation 5.01, section 3.)

The TAC emissions from the combustion of natural gas are considered to be “*de minimis* emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions

from a process or process equipment that are not the products of the combustion of natural gas. (Regulation 5.21, section 2.7)

b. Emission Unit U-00 – Natural Gas Boilers

i. Equipment:

U-00 Emission Points			
Emission Point	Description	Applicable Regulation(s)	Basis for Applicability
E-165	Three (3) Boilers less than 10 MMBtu/hr (Fire Pump House)	7.06	Boilers with heat generating capacities greater than 1 MMBtu/hr, modified after April 9, 1972, are subject to Regulation 7.06 for PM and SO ₂ .
		6.42	
		40 CFR 63 Subpart DDDDD	
E-162	Two (2) Cleaver-Brooks Admin boilers (No. 1 and 2); rated at 14.65 MMBtu/hr; installed in 1968; natural gas-fired with propane backup.	6.07	Boilers with heat generating capacities greater than 1 MMBTU/hr, modified before April 9, 1972, are subject to Regulation 6.07 for PM and SO ₂ .
		6.42	
		40 CFR 60 Subpart DC	
E-160	Three (3) Cleaver-Brooks boilers Paint (No.3-6); 20.92 MMBtu/hr, installed 1993, and 1993; natural gas-fired, with propane backup.	40 CFR 63 Subpart DDDDD	Boilers emitting large amounts of NO _x are subject to Regulation 6.42 for major nitrogen oxides emitting facilities.
		7.06	
		6.42	
E-161	Four (4) 29.29 MMBtu/hr Cleaver-Brooks boilers (no.8 - 11), installed 1993; natural gas-fired with propane backup.	40 CFR 60 Subpart DC	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
		7.06	
		6.42	
E-161	Four (4) 29.29 MMBtu/hr Cleaver-Brooks boilers (no.8 - 11), installed 1993; natural gas-fired with propane backup.	40 CFR 63 Subpart DDDDD	Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
		7.06	
		6.42	

ii. Standards/Operating Limits

a. VOC

Per Regulation 2.05, the 10-year actuals VOC PAL limit was determined by adding the baseline actual emissions

from 2000/2001 (881.35) to the PSD significance level for VOC emissions (39) resulting in 920.35 tons per year.

b. PM

- 1) Per Regulation 2.05, the 10-year actuals PM/PM₁₀ PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.6) to the PSD significance level for PM/PM₁₀ emissions (14.9) resulting in 50.5 tons per year PM/PM₁₀.
- 2) Per Regulation 2.05, the 10-year actuals PM_{2.5} PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.15) to the PSD significance level for PM/PM_{2.5} emissions (9.9) resulting in 45.05 tons per year PM/PM₁₀.
- 3) The emission standard for PM is determined in accordance with Regulation 6.07, section 3.1 and 7.06, section 4.1.4.

c. Opacity

Regulation 6.07, section 3.2 and 7.06, section 5.1.1 establishes an opacity standard of less than 20% except for:

Emission Points 160, 161, 162 and 165:

- 1) For indirect heat exchangers with a heat input capacity of less than 250 million BTU/hr, a maximum of 40% opacity shall be permissible for not more than two consecutive minutes in any 60 consecutive minutes;
- 2) For emissions from an indirect heat exchanger during building a new fire for the period required to bring the boiler up to operating conditions provided the method used is that recommended by the manufacturer and the time does not exceed the manufacturer's recommendations.

d. **SO₂**

- i. Per Regulation 2.05, the 10-year actuals SO₂ PAL limit was determined by adding the baseline actual emissions from 2000/2001 (0.58) to the PSD significance level for SO₂ emissions (39) resulting in 39.58 tons per year.
- ii. For Emission Point E-162 the emission standard for SO₂ is determined in accordance with Regulation 6.07, section 4.1.
- iii. For Emission Point E-160, E-161 and E-165, the emission standard for SO₂ is determined in accordance with Regulation 7.06, section 5.1.1.
- iv. The Emission Points are subject to 40 CFR 60, Subpart Dc. However, there is no SO₂ emission standard for natural-gas fired boilers in Subpart Dc.

e. **NO_x**

To avoid the RACT requirements of District Regulation 6.42 for major NO_x-emitting sources, Ford has requested a 99 ton per year on emissions of this pollutant.

f. **HAP**

Per Regulation 5.02, section 4.91, the source is subject to 40 CFR 63, Subpart DDDDD.

iii. **Monitoring and Record Keeping**

Emissions Calculation Methodology: The calculated emissions are based upon natural gas usage with the emissions factor for natural gas coming from AP-42.

a. **VOC**

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires the source to monitor the *plant-wide* VOC emissions during each consecutive 12-month period to assure the emissions of VOC remain below the PAL limit.

b. **PM**

Regulation 6.07 and 7.06 does not require any specific monitoring requirements for opacity, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 6.07 and 7.06 does not require any specific monitoring requirements for opacity, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

d. **SO₂**

i. For Emission Points E-162 and E-165 a one-time SO₂ compliance demonstration, using AP-42 emission factors and combusting natural gas, has shown that the pounds per million BTU emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements for these boilers with respect to SO₂ emission limits.

ii. For Emission Points E-160 and E-161, 40 CFR 60, Subpart Dc requires records of the amount of fuel combusted each month.

e. **NO_x**

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records of NO_x emissions must be retained to ensure compliance with the plant-wide 99 ton NO_x emission limit. The NO_x emissions can be determined by measuring the fuel throughput.

f. **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart DDDDD.

iv. **Reporting**

a. **VOC**

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

b. **PM**

Regulation 2.16, section 4.1.9.3 requires sufficient reporting requirements to assure compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 2.16, section 4.1.9.3 requires sufficient reporting requirements to assure compliance with the terms and conditions of the permit.

d. **SO₂**

There are no periodic compliance reporting requirements for this equipment.

e. **NO_x**

Regulation 2.16, section 4.1.9.3 requires sufficient reporting requirements to assure compliance with the terms and conditions of the permit.

f. **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart DDDDD.

c. **Emission Unit U-11 - Volatile Organic Liquid Storage Tanks**i. **Equipment:**

U-11 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-39	11,600 gallon Spill Containment Tank # 3	N/A	Exempt (UST with annual turnover < two times tank capacity)
E-40	11,600 gallon Spill Containment Tank #4	N/A	Exempt (UST with annual turnover < two times tank capacity)
E-44	20,000 gallon Diesel Fuel Tank # 8	7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-45	20,000 gallon Diesel Fuel Tank # 9	7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-46	20,000 gallon Diesel Fuel Tank # 10	7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-47	20,000 gallon Diesel Fuel Tank # 11	7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-50	6,000 gallon Brake Fluid Tank # 14	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
		7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-53	20,000 gallon Transmission Fluid Tank # 17	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
		7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.

U-11 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-54	20,000 gallon Transmission Fluid Tank # 18	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
		7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-58	20,000 gallon Antifreeze Tank # 22	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
		7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-59	10,000 gallon Purge Paint Reclaim Tank # 78	7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-60	8,000 gallon Windshield Washer Fluid Tank # 23	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
		40 CFR 63 Subpart EEEE	Organic Liquids Distribution Operations
		7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-63	6,000 gallon Sulfuric Acid DI Water Tank # 25	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
E-64	6,000 gallon Caustic Soda DI Water Tank # 26	N/A	N/A
E-74	6,000 gallon Sulfuric Acid Wastewater Treatment Tank # 37	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
E-75	6,000 gallon Caustic Soda Wastewater Treatment Tank # 38	N/A	N/A

U-11 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-78	10,000 gallon Waterbased Purge Tank # 76	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
		7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-79	10,000 gallon Waterbased Purge Tank # 77	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
		7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-80	10,000 gallon Solvent Purge Tank #74	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
		7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-81	10,000 gallon Solvent Purge Tank #75	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
		7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-112, E-113	20,000 gallon E-Coat Wastewater Treatment (2 tanks) Tank # 40	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
E-114, E-115, E-116, E-117, E-118	150,000 gallon Wastewater Treatment (5 tanks) Tank # 41	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
E-119, E-120, E-121, E-122	20,000 gallon Sludge Decant (4 tanks) Tank # 42	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
E-125	6,000 gallon Car Wash Tank # 62	N/A	N/A
E-126	6,000 gallon Phosphate Dip Tank # 63	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.

U-11 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-127	6,000 gallon Phosphate Bath Tank # 64	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
E-128	6,000 gallon Phosphate Bath # 65	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
E-131	4,000 gallon Grate Coating Tank # 68	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
		7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-133	3,000 gallon E-Coat Wastewater Treatment Tank # 71	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
E-134	1,000 gallon Used Oil Tank # 70	7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.

ii. **Standards/Operating Limits**

VOC

- 1) Regulation 7.12, section 3.3 requires submerged fill if the materials have an as stored vapor pressure of 1.5 psia or greater. Regulation 7.12 applies due to the size of the tanks, however, since the vapor pressure as stored is less than 1.5 psia there are no applicable emission or equipment standards.
- 2) Per Regulation 2.05, the 10-year actuals VOC PAL limit was determined by adding the baseline actual emissions from 2000/2001 (881.35) to the PSD significance level for VOC emissions (39) resulting in 920.35 tons per year.
- 3) Emission points are not subject to 40 CFR 60 Subpart Kb because this subpart does not apply to storage vessels with a capacity greater than or equal to 151 m³ (39,890 gallons) storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) (0.51 psi) or with a capacity greater than or equal to 75 m³ (19,813 gallons) but less than

151 m³ (39,890 gallons) storing a liquid with a maximum true vapor pressure less than 15.0 kPa (2.18 psi).

iii. **Monitoring and Record Keeping**

Emissions Calculation Methodology: The VOC storage tanks emissions are based upon the VOC content of the stored material and the amount of material in the tank.

VOC

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records of the content of the listed VOC storage tank is necessary to accurately estimate annual VOC emissions.

iv. **Reporting**

VOC

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit. There are no Emission Unit specific compliance reporting requirements for the tanks. The source is required to report the throughput for purposes of demonstrating ongoing compliance with the plant-wide PAL VOC emission limit.

d. Emission Unit U-12 – Plant-wide Product Fueling and Plant Vehicle Refueling

i. Equipment:

U-12 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E37	Gasoline Tank T1	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
		7.15	
E38	Gasoline Tank T2	5.21	Standards of Performance for Gasoline Transfer to New Service Station Storage Tanks (Stage I Vapor Recovery)
		7.15	
E82	Three (3) Fueling Stations	See d.ii.2) and 3)	See d.ii.2) and 3)

ii. Standards/Operating Limits

VOC

- 1) Regulation 7.15 requires that storage tanks shall be equipped with the following:
 - a. A submerged fill pipe;
 - b. If the gasoline storage tank is equipped with a separate gauge well, a gauge well drop tube shall be installed which extends to within six inches of the bottom of the tank;
 - c. Vent line restrictions on the affected facility; and
 - d. Vapor balance system and vapor tight connections on the liquid fill and vapor return hoses. The cross-sectional area of the vapor return hose and any other vapor return passages in the circuit connecting the vapor space in the service station tank to that of the truck tank must be at least 50% of the liquid fill hose cross-sectional area for each tank and free of flow restrictions to achieve acceptable recovery. The vapor balance equipment must be maintained according to the manufacturer's specifications. The type, size and design of the vapor balance system are subject to the approval of the District.

- 2) The District reviewed a letter dated January 18, 2007 regarding the current applicability of Stage II Vapor Recovery. EPA has provided guidance that vehicle production plants doing initial fueling of vehicle comply with vapor recovery requirements by means of ORVR requirements for compliant vehicles. The District concurs that the external vapor recovery system is not required for predominantly fueling finished vehicles with ORVR.
- 3) Regulation 6.40 does not apply to the initial fueling of new motor vehicles at a motor vehicle assembly facility per section 2.1.2.

iii. **Monitoring and Record Keeping**

Emissions Calculation Methodology: AP-42 emission factors are used to calculate emissions from the gasoline fueling operation.

VOC

Regulation 7.15 does not require any specific monitoring or record keeping requirements for VOC, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and recordkeeping to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

VOC

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

e. **Emission Unit U-15 – Phosphate System**

i. **Equipment**

U-15 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-86	Phosphate	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
E-137	Phosphate Dump Tank	5.21	
E-138	Phosphate Dump Tank	5.21	

ii. **Standards/Operating Limits**

TAC

Regulations 5.01 and 5.21 require that TAC emissions do not exceed environmentally acceptable levels, whether specifically established by modeling or determined by the District to be de minimis.

iii. **Monitoring and Record Keeping**

TAC

Regulation 5.21, section 4.10 establishes monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

TAC

Regulation 5.21, sections 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

f. Emission Unit U-16 – E-Coat Operation

i. Equipment:

U-16 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-87	E-Coat Dip Tank	40 CFR 60 Subpart MM	Subpart MM National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations establishes standards
		40 CFR 63 Subpart IIII	Subpart IIII Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks
	High Temperature Cure Oven	40 CFR 60 Subpart MM	Subpart MM National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations establishes standards
		40 CFR 63 Subpart IIII	Subpart IIII Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks
		7.08	This regulation applies to each process operation that is the affected facility not otherwise regulated by other regulations of Regulation 7 and that commenced construction after September 1, 1976.
E-88	E-Coat Scuff Booth	7.08	This regulation applies to each process operation that is the affected facility not otherwise regulated by other regulations of Regulation 7 and that commenced construction after September 1, 1976.
E-129	12,700 gallon E-Coat Resin Tank # 66	7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-135	E-Coat Dump Tank	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
		7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-136	E-Coat Dump Tank	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
		7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.

ii. Standards/Operating Limits**1) VOC**

- 1) The E-Coat Operation is subject to 40 CFR Part 63, Subpart IIII - Surface Coating of Automobiles and Light-Duty Trucks and 40 CFR 60, Subpart MM - National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations section 60.392 emission limits.
- 2) For Emission Point E-135 and E-136, Regulation 7.12, section 3.3 requires submerged fill if the materials have an as stored vapor pressure of 1.5 psia or greater. Regulation 7.12 applies due to the size of the tanks, however, since the vapor pressure as stored is less than 1.5 psia there are no applicable emission or equipment standards.
- 3) Per Regulation 2.05, the 10-year actuals VOC PAL limit was determined by adding the baseline actual emissions from 2000/2001 (881.35) to the PSD significance level for VOC emissions (39) resulting in 920.35 tons per year.

b. PM

- 1) The PM limits are calculated per Regulation 7.08, section 3.1.2. The equation to calculate the emission limits is $E = 3.59P^{0.62}$, where P is expressed in tons/hr.
- 2) Per Regulation 2.05, the 10-year actuals PM/PM₁₀ PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.6) to the PSD significance level for PM/PM₁₀ emissions (14.9) resulting in 50.5 tons per year PM/PM₁₀.
- 3) Per Regulation 2.05, the 10-year actuals PM_{2.5} PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.15) to the PSD significance level for PM/PM_{2.5} emissions (9.9) resulting in 45.05 tons per year PM/PM₁₀.

c. **Opacity**

Regulation 7.08, section 3.1.2. establishes an opacity standard of less than 20%.

d. **HAP**

40 CFR 63 Subpart IIII and 40 CFR 60 Subpart MM establishes HAP emission limits used in coating operations.

e. **NO_x**

- 1) Regulation 7.08, section 4.1. requires that the source shall not allow NO_x emissions to exceed 300 ppm by volume expressed as NO₂.
- 2) The District has performed a one-time NO_x compliance demonstration using AP-42 emission factors and combusting natural gas, and the emission standard cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to NO_x emission limits.

iii. **Monitoring and Record Keeping**

Emissions Calculation Methodology: Usage of various coatings, sealers, cleaners, and adhesives is tracked, and the VOC content is known. A material balance approach is used with an assumed control factor to calculate emissions.

a. **VOC**

40 CFR Part 63, Subpart IIII - Surface Coating of Automobiles and Light-Duty Trucks and 40 CFR 60, Subpart MM - National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations sections 60.392 and 60.395 establishes monitoring and record keeping requirements. Regulation 2.16, section 4.1.9.1 and 4.1.9.2 establishes monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

b. **PM**

Regulation 7.08 does not require any specific monitoring requirements for PM, however, Regulation 2.16, sections

4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 7.08 does not require any specific monitoring requirements for opacity, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure compliance with the terms and conditions of the permit.

d. **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart IIII and 40 CFR 60, Subpart MM.

e. **NO_x**

Regulation 7.08 does not require any specific monitoring requirements for NO_x, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure compliance with the terms and conditions of the permit.

iv. **Reporting**

a. **VOC**

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

b. **PM**

Regulation 7.08 does not require any specific reporting requirements for PM, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 7.08 does not require any specific reporting requirements for opacity, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

d. **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart IIII and 40 CFR 60, Subpart MM.

e. **NO_x**

Regulation 7.08 does not require any specific reporting requirements for NO_x, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

g. **Emission Unit U-17 – Sealer**i. **Equipment:**

U-17 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-89	Sealer Application and Gel Oven	7.59	The sealer operation is subject to the VOC emission standard in Regulation 7.59 and was installed after September 1, 1976.
	Sealers and Deadeners (other than glass bonding)	40 CFR 63 Subpart IIII	Subpart IIII Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks

ii. **Standards/Operating Limits**a. **VOC**

- 1) Regulation 7.59, section 3.1.3. requires the source shall not cause or allow the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of 3.0 lb VOC/gal of coating, excluding water and exempt solvents, as applied for extreme performance coatings.
- 2) Per Regulation 2.05, the 10-year actuals VOC PAL limit was determined by adding the baseline actual emissions from 2000/2001 (881.35) to the PSD significance level for VOC emissions (39) resulting in 920.35 tons per year.

b. **HAP**

40 CFR 63 Subpart IIII establishes HAP emission limits used in coating operations.

iii. **Monitoring and Record Keeping**

Emissions Calculation Methodology: Usage of various coatings, sealers, cleaners, and adhesives is tracked, and the VOC content is known. A material balance approach is used to calculate emissions.

a. **VOC**

- 1) Regulation 7.59, section 6.1 and Regulation 2.16, section 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.
- 2) Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires the source to monitor the *plant-wide* VOC emissions during each consecutive 12-month period to assure the emissions of VOC remain below the PAL limit.

b. **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart IIII.

iv. **Reporting**

a. **VOC**

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

b. **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart IIII.

h. Emission Unit U-18 – Guidecoat Operation**i. Equipment:**

U-18 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-90, E-91 and E-118	Guidecoat Paint Spray Booth with Water Wash Including Wet-on-Wet Tutone Application	40 CFR 60 Subpart MM	Subpart MM National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations establishes standards
		40 CFR 63 Subpart IIII	Subpart IIII Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks
		7.08	For Regulation 7.08 the equipment is subject to PM emission standard and was installed after September 1, 1976
	High Temperature Cure Oven	40 CFR 60 Subpart MM	Subpart MM National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations establishes standards
		40 CFR 63 Subpart IIII	Subpart IIII Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks
		7.08	This regulation applies to each process operation that is the affected facility not otherwise regulated by other regulations of Regulation 7 and that commenced construction after September 1, 1976.
E-108	Guidecoat/Topcoat Paint Kitchen	40 CFR 60.3092	Subpart MM National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations establishes standards
E-92	Guidecoat (Prime) Scuff Booth	7.08	This regulation applies to each process operation that is the affected facility not otherwise regulated by other regulations of Regulation 7 and that commenced construction after September 1, 1976.

ii. Standards/Operating Limits**a. VOC**

- 1) The Guidecoat Operation is subject to 40 CFR Part 63, Subpart IIII - Surface Coating of Automobiles and Light-Duty Trucks and 40 CFR 60, Subpart MM - National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations section 60.392 emission limits.

- 2) Per Regulation 2.05, the 10-year actuals VOC PAL limit was determined by adding the baseline actual emissions from 2000/2001 (881.35) to the PSD significance level for VOC emissions (39) resulting in 920.35 tons per year.

b. **PM**

- 1) Per Regulation 2.05, the 10-year actuals PM/PM₁₀ PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.6) to the PSD significance level for PM/PM₁₀ emissions (14.9) resulting in 50.5 tons per year PM/PM₁₀.
- 2) Per Regulation 2.05, the 10-year actuals PM_{2.5} PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.15) to the PSD significance level for PM/PM_{2.5} emissions (9.9) resulting in 45.05 tons per year PM/PM₁₀.
- 3) The PM limits are calculated per Regulation 7.08, section 3.1.2. The equation to calculate the emission limits is $E = 3.59P^{0.62}$, where P is expressed in tons/hr.

c. **Opacity**

Regulation 7.08, section 3.1.2. establishes an opacity standard of less than 20%.

d. **HAP**

40 CFR 63 Subpart IIII and 40 CFR 60 Subpart MM establishes HAP emission limits used in coating operations.

e. **NO_x**

- 1) Regulation 7.08, section 4.1. requires that the source shall not allow NO_x emissions to exceed 300 ppm by volume expresses as NO₂.

- 2) The District has performed a one-time NO_x compliance demonstration using AP-42 emission factors and combusting natural gas, and the emission standard cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to NO_x emission limits.

iii. **Monitoring and Record Keeping**

Emissions Calculation Methodology: Usage of various coatings, sealers, cleaners, and adhesives is tracked, and the VOC content is known. A material balance approach is used with an assumed control factor to calculate emissions.

a. **VOC**

40 CFR Part 63, Subpart IIII - Surface Coating of Automobiles and Light-Duty Trucks and 40 CFR 60, Subpart MM - National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations sections 60.392 and 60.395 establishes monitoring and record keeping requirements. Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

b. **PM**

Regulation 7.08 does not require any specific monitoring requirements for PM, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 7.08 does not require any specific monitoring requirements for opacity, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure compliance with the terms and conditions of the permit.

d. **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart IIII and 40 CFR 60, Subpart MM.

e. **NO_x**

Regulation 7.08 does not require any specific monitoring requirements for opacity, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure compliance with the terms and conditions of the permit.

iv. **Reporting**

a. **VOC**

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

b. **PM**

Regulation 7.08 does not require any specific reporting requirements for PM, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 7.08 does not require any specific reporting requirements for opacity, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

d. **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart IIII and 40 CFR 60, Subpart MM.

e. **NO_x**

Regulation 7.08 does not require any specific reporting requirements for opacity, however, Regulation 2.16, section

4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

i. Emission Unit U-19 – Topcoat/Final Repair Operations

i. Equipment:

U-19 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-93	Topcoat Spray Booth #1	40 CFR 60 Subpart MM	Subpart MM National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations establishes standards
		40 CFR 63 Subpart IIII	Subpart IIII Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks
		7.08	For Regulation 7.08 the equipment is subject to PM emission standard and was installed after September 1, 1976
E-94	Topcoat Cure Oven#1	40 CFR 60 Subpart MM	Subpart MM National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations establishes standards
		40 CFR 63 Subpart IIII	Subpart IIII Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks
		7.08	For Regulation 7.08 the equipment is subject to PM emission standard and was installed after September 1, 1976
E-95	Topcoat Scuff Booth #1	7.08	This regulation applies to each process operation that is the affected facility not otherwise regulated by other regulations of Regulation 7 and that commenced construction after September 1, 1976.
E-96	Topcoat Spray Booth #2	40 CFR 60 Subpart MM	Subpart MM National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations establishes standards
		40 CFR 63 Subpart IIII	Subpart IIII Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks
		7.08	For Regulation 7.08 the equipment is subject to PM emission standard and was installed after September 1, 1976

U-19 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-97	Topcoat Curing Oven #2	40 CFR 60 Subpart MM	Subpart MM National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations establishes standards
		40 CFR 63 Subpart IIII	Subpart IIII Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks
		7.08	For Regulation 7.08 the equipment is subject to PM emission standard and was installed after September 1, 1976
E-98	Topcoat Scuff Booth #2	7.08	This regulation applies to each process operation that is the affected facility not otherwise regulated by other regulations of Regulation 7 and that commenced construction after September 1, 1976.
E-99	Spot Repair Area	40 CFR 60 Subpart MM	Subpart MM National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations establishes standards
E-103	103 Final Repair/Topcoat Paint Spray Booth	40 CFR 63 Subpart IIII	Subpart IIII Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks
		7.08	For Regulation 7.08 the equipment is subject to PM emission standard and was installed after September 1, 1976
E-104	Final Repair/Topcoat Oven	40 CFR 63 Subpart IIII	Subpart IIII Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks
		7.08	For Regulation 7.08 the equipment is subject to PM emission standard and was installed after September 1, 1976

ii. **Standards/Operating Limits**

a. **VOC**

- 1) The Topcoat Operation is subject to 40 CFR Part 63, Subpart IIII - Surface Coating of Automobiles and Light-Duty Trucks and 40 CFR 60, Subpart MM - National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.

- 2) Per Regulation 2.05, the 10-year actuals VOC PAL limit was determined by adding the baseline actual emissions from 2000/2001 (881.35) to the PSD significance level for VOC emissions (39) resulting in 920.35 tons per year.

b. **PM**

- 1) Per Regulation 2.05, the 10-year actuals PM/PM₁₀ PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.6) to the PSD significance level for PM/PM₁₀ emissions (14.9) resulting in 50.5 tons per year PM/PM₁₀.
- 2) Per Regulation 2.05, the 10-year actuals PM_{2.5} PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.15) to the PSD significance level for PM/PM_{2.5} emissions (9.9) resulting in 45.05 tons per year PM/PM₁₀.
- 3) The PM limits are calculated per Regulation 7.08, section 3.1.2 The equation to calculate the emission limits is $E = 3.59P^{0.62}$, where P is expressed in tons/hr.

c. **Opacity**

Regulation 7.08, section 3.1.2. establishes an opacity standard of less than 20%.

d. **HAP**

40 CFR 63 Subpart IIII and 40 CFR 60 Subpart MM establishes HAP emission limits used in coating operations.

e. **NO_x**

- 1) Regulation 7.08, section 4.1. requires that the source shall not allow NO_x emissions to exceed 300 ppm by volume expresses as NO₂.
- 2) The District has performed a one-time NO_x compliance demonstration using AP-42 emission factors and combusting natural gas, and the emission standard cannot be exceeded. Therefore, there are no monitoring, record keeping, and

reporting requirements with respect to NO_x emission limits.

iii. **Monitoring and Record Keeping**

Emissions Calculation Methodology: Usage of various coatings, sealers, cleaners, and adhesives is tracked, and the VOC content is known. A material balance approach is used with an assumed control factor to calculate emissions.

a. **VOC**

40 CFR Part 63, Subpart IIII - Surface Coating of Automobiles and Light-Duty Trucks and 40 CFR 60, Subpart MM - National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations sections 60.392 and 60.395 establishes monitoring and record keeping requirements. Regulation 2.16, section 4.1.9.1 and 4.1.9.2 establishes monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

b. **PM**

Regulation 7.08 does not require any specific monitoring requirements for PM, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 7.08 does not require any specific monitoring requirements for opacity, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure compliance with the terms and conditions of the permit.

d. **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart IIII and 40 CFR 60, Subpart MM.

e. **NO_x**

Regulation 7.08 does not require any specific monitoring requirements for NO_x, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure compliance with the terms and conditions of the permit.

iv. **Reporting**

a. **VOC**

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

b. **PM**

Regulation 7.08 does not require any specific reporting requirements for PM, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 7.08 does not require any specific reporting requirements for opacity, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

d. **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart IIII and 40 CFR 60, Subpart MM.

e. **NO_x**

Regulation 7.08 does not require any specific reporting requirements for NO_x, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

j. Emission Unit U-20 – Black-Out and Wax**i. Equipment:**

U-20 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-100	Blackout Paint and Wax Spray Booth	7.08	For Regulation 7.08 the equipment is subject to PM emission standard and was installed after September 1, 1976
		7.59	The equipment is subject to the VOC emission standard in Regulation 7.59 and was installed after September 1, 1976
		40 CFR 63 Subpart IIII	Subpart IIII Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks

ii. Standards/Operating Limits**a. VOC**

- 1) Regulation 7.59, section 3.1.4 requires the source shall not cause or allow the emission of VOC from any affected facility resulting from the black-out paint to exceed 3.0 lb VOC/gal, excluding water.
- 2) Per Regulation 2.05, the 10-year actuals VOC PAL limit was determined by adding the baseline actual emissions from 2000/2001 (881.35) to the PSD significance level for VOC emissions (39) resulting in 920.35 tons per year.

b. PM

- 1) Per Regulation 2.05, the 10-year actuals PM/PM₁₀ PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.6) to the PSD significance level for PM/PM₁₀ emissions (14.9) resulting in 50.5 tons per year PM/PM₁₀.
- 2) Per Regulation 2.05, the 10-year actuals PM_{2.5} PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.15) to the PSD significance level for PM/PM_{2.5} emissions (9.9) resulting in 45.05 tons per year PM/PM₁₀.

- 3) The PM limits are calculated per Regulation 7.08, section 3.1.2. The equation to calculate the emission limits is $E = 3.59P^{0.62}$, where P is expressed in tons/hr.

c. **Opacity**

Regulation 7.08, section 3.1.2. establishes an opacity standard of less than 20%.

d. **HAP**

40 CFR 63 Subpart IIII establishes HAP emission limits used in coating operations.

iii. **Monitoring and Record Keeping**

Emissions Calculation Methodology: Usage of various coatings, sealers, cleaners, and adhesives is tracked, and the VOC content is known. A material balance approach is used with an assumed control factor to calculate emissions.

a. **VOC**

- 1) Regulation 7.59, section 6.1 and Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.
- 2) Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires the source to monitor and record the *plant-wide* VOC emissions during each consecutive 12-month period to assure the emissions of VOC remain below the *plant-wide* PAL limit.

b. **PM**

Regulation 7.08 does not require any specific monitoring requirements for PM, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 7.08 does not require any specific monitoring requirements for opacity, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure compliance with the terms and conditions of the permit.

d. **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart IIII.

iv. **Reporting**

a. **VOC**

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

b. **PM**

Regulation 7.08 does not require any specific reporting requirements for PM, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 7.08 does not require any specific reporting requirements for opacity, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

d. **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart IIII and 40 CFR 60, Subpart MM.

k. Emission Unit U-22 – Cleaning Operations**i. Equipment:**

U-22 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-109	Purge and Cleaning	7.25	Regulation 7.25 establishes VOC standards for affected facilities constructed after June 13, 1979.
		40 CFR 63 Subpart III	Subpart III Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks
E-102	Cleaning Paint Pots	7.25	Regulation 7.25 establishes VOC standards for affected facilities constructed after June 13, 1979.
		40 CFR 63 Subpart III	Subpart III Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks
N/A	Solvent Metal Cleaning Equipment	6.18	Cold solvent parts washer is subject to the VOC emission standard in Regulation 6.18

ii. Standards/Operating Limits**a. VOC**

- 1) For all cold solvent parts washers, the source shall comply with the standards of Regulation 6.18, sections 4.1 through 4.3.
- 2) Per Regulation 2.05, the 10-year actuals VOC PAL limit was determined by adding the baseline actual emissions from 2000/2001 (881.35) to the PSD significance level for VOC emissions (39) resulting in 920.35 tons per year.

b. HAP

40 CFR 63 Subpart III establishes HAP emission limits used in coating operations.

iii. Monitoring and Record Keeping

Emissions Calculation Methodology: Usage of various coatings, sealers, cleaners, and adhesives is tracked, and the VOC content is known. A material balance approach is used to calculate emissions.

a. **VOC**

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

b. **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart IIII.

iv. **Reporting**a. **VOC**

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

b. **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart IIII.

I. **Emission Unit U-28 – Aluminum Scrap System**i. **Equipment:**

U-28 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-150	Aluminum Scrap Shredder	7.08	For Regulation 7.08 the equipment is subject to PM emission standard and was installed after September 1, 1976

ii. **Standards/Operating Limits**a. **PM**

- 1) The PM limits are calculated per Regulation 7.08, section 3.1.2. The equation to calculate the emission limits is $E = 3.59P^{0.62}$, where P is expressed in tons/hr.

- 2) Per Regulation 2.05, the 10-year actuals PM/PM₁₀ PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.6) to the PSD significance level for PM/PM₁₀ emissions (14.9) resulting in 50.5 tons per year PM/PM₁₀.
- 3) Per Regulation 2.05, the 10-year actuals PM_{2.5} PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.15) to the PSD significance level for PM/PM_{2.5} emissions (9.9) resulting in 45.05 tons per year PM/PM₁₀.

b. **Opacity**

Regulation 7.08, section 3.1.1. establishes an opacity standard of less than 20%.

iii. **Monitoring and Record Keeping**

a. **PM**

There are no compliance monitoring or recordkeeping requirements for this equipment, beside visual inspections of the dust collector. The potential controlled PM emissions are less than the applicable emission standard.

b. **Opacity**

Regulation 7.08 does not require any specific monitoring requirements for opacity, however, Regulation 2.16, section 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure compliance with the terms and conditions of the permit.

iv. **Reporting**

a. **PM**

There are no routine compliance reporting requirements for this equipment, besides any deviation from performing the visible inspections. The potential controlled PM emissions are less than the applicable emission standard.

b. **Opacity**

Regulation 7.08 does not require any specific reporting requirements for opacity, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

m. **Emission Unit U-29 – Mobile Equipment Maintenance Booth (ITR)**i. **Equipment:**

U-29 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-151	Mobile Equipment Maintenance Booth (ITR)	7.08	For Regulation 7.08 the equipment is subject to PM emission standard and was installed after September 1, 1976
		7.79	New Commercial Motor Vehicle and Mobile Equipment Refinishing Operations

ii. **Standards/Operating Limits**a. **VOC**

- 1) Regulation 7.79, section 3.5 requires the source shall only use waterborne coatings with a VOC content less than 2.0 lb VOC/gal, as applied.
- 2) Per Regulation 2.05, the 10-year actuals VOC PAL limit was determined by adding the baseline actual emissions from 2000/2001 (881.35) to the PSD significance level for VOC emissions (39) resulting in 920.35 tons per year.

b. **PM**

- 1) The PM limits are calculated per Regulation 7.08, section 3.1.2. The equation to calculate the emission limits is $E = 3.59P^{0.62}$, where P is expressed in tons/hr.
- 2) Per Regulation 2.05, the 10-year actuals PM/PM₁₀ PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.6) to the PSD significance level for PM/PM₁₀ emissions (14.9) resulting in 50.5 tons per year PM/PM₁₀.

- 3) Per Regulation 2.05, the 10-year actuals $PM_{2.5}$ PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.15) to the PSD significance level for $PM/PM_{2.5}$ emissions (9.9) resulting in 45.05 tons per year PM/PM_{10} .

c. **Opacity**

Regulation 7.08, section 3.1.1. establishes an opacity standard of less than 20%.

iii. **Monitoring and Record Keeping**

Emissions Calculation Methodology: Usage of various coatings, sealers, cleaners, and adhesives is tracked, and the VOC content is known. A material balance approach is used with an assumed control factor to calculate emissions.

a. **VOC**

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

b. **PM**

- 1) Using HVLP spray guns (transfer efficiency of 65%), the percent solids of the material, and the efficiency of the filters (greater than 90%), the PM emission limit of the spray booth cannot be exceeded.
- 2) Regulation 7.08 does not require any specific monitoring requirements for PM, however, Regulation 2.16, section 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 7.08 does not require any specific monitoring requirements for opacity, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring

and record keeping to assure compliance with the terms and conditions of the permit.

iv. **Reporting**

a. **VOC**

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

b. **PM**

Regulation 7.08 does not require any specific reporting requirements for PM, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 7.08 does not require any specific reporting requirements for opacity, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

n. **Emission Unit U-30/U-33 – Windshield Installation Operation**

i. **Equipment:**

U-30/U-33 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-160 and E-152	Glass Installation in Vehicles Using Primers, Glass Cleaners and Adhesives	7.25	Regulation 7.25 establishes VOC standards for affected facilities constructed after June 13, 1979.
		7.59	The equipment is subject to the VOC emission standard in Regulation 7.59 and was installed after September 1, 1976
		40 CFR 63 Subpart IIII	Subpart IIII Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks

ii. Standards/Operating Limits**a. VOC**

- 1) Regulation 7.25. and 7.59, section 3.1.3 require that the source shall not cause or allow the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of 3.5 lb VOC/gal of coating, excluding water and exempt solvents, as applied, for extreme performance coatings.
- 2) The District has determined that the primer application is subject to Regulation 7.59 and the adhesive application is subject to Regulation 7.25. The District has determined that the 3.5 lbs of VOC/gallon volume weighted average is BACT for this process.
- 3) 40 CFR 63, Subpart MM does not apply because this operation does not spray or use a dip tank when applying coatings. The company uses rollers as their coating application method.
- 4) Per Regulation 2.05, the 10-year actuals VOC PAL limit was determined by adding the baseline actual emissions from 2000/2001 (881.35) to the PSD significance level for VOC emissions (39) resulting in 920.35 tons per year.

b. HAP

40 CFR 63 Subpart IIII establishes HAP emission limits used in coating operations.

iii. Monitoring and Record Keeping

Emissions Calculation Methodology: Usage of various coatings, sealers, cleaners, and adhesives is tracked, and the VOC content is known. A material balance approach is used to calculate emissions.

a. **VOC**

- 1) Regulation 7.59, section 6.1 and Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.
- 2) Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires the source to monitor and record the *plant-wide* VOC emissions during each consecutive 12-month period to assure the emissions of VOC remain below the *plant-wide* PAL limit.

b. **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart IIII.

iv. **Reporting**a. **VOC**

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

b. **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart IIII.

o. Emission Unit U-31 – Bedliner Coating Booth

i. Equipment:

U-31 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-153	Bedliner Coating Booth	7.08	For Regulation 7.08 the equipment is subject to PM emission standard and was installed after September 1, 1976
		7.59	The equipment is subject to the VOC emission standard in Regulation 7.59 and was installed after September 1, 1976
E-154	Spot Repair Area	7.59	The equipment is subject to the VOC emission standard in Regulation 7.59 and was installed after September 1, 1976
E-155	8,000 gallon Isocyanate Resin Tank and Totes	5.21	Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
	8,000 gallon Polyamine Resin Tank and Totes		

ii. Standards/Operating Limits

a. VOC

- 1) Regulation 7.59, section 3.1.3. requires the source shall not cause or allow the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of 3.5 lb VOC/gal of coating, excluding water and exempt solvents, as applied for extreme performance coatings.
- 2) 40 CFR 60 Subpart MM does not apply since this bedliner booth is not a guide coat operation, a topcoat operation, or a prime coat operation. (40 CFR 60.390(a))
- 3) Per Regulation 2.05, the 10-year actuals VOC PAL limit was determined by adding the baseline actual emissions from 2000/2001 (881.35) to the PSD significance level for VOC emissions (39) resulting in 920.35 tons per year.

b. PM

- 1) The PM limits are calculated per Regulation 7.08, section 3.1.2. The equation to calculate the emission limits is $E = 3.59P^{0.62}$, where P is expressed in tons/hr.
- 2) Per Regulation 2.05, the 10-year actuals PM/PM₁₀ PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.6) to the PSD significance level for PM/PM₁₀ emissions (14.9) resulting in 50.5 tons per year PM/PM₁₀.
- 3) Per Regulation 2.05, the 10-year actuals PM_{2.5} PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.15) to the PSD significance level for PM/PM_{2.5} emissions (9.9) resulting in 45.05 tons per year PM/PM₁₀.

c. Opacity

Regulation 7.08, section 3.1.1. establishes an opacity standard of less than 20%.

iii. Monitoring and Record Keeping

Emissions Calculation Methodology: Usage of various coatings, sealers, cleaners, and adhesives is tracked, and the VOC content is known. A material balance approach is used to calculate emissions.

a. VOC

- 1) Regulation 7.59, section 6.1 and Regulation 2.16, section 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.
- 2) Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires the source to monitor and record the *plant-wide* VOC emissions during each consecutive 12-month period to assure the emissions of VOC remain below the *plant-wide* PAL limit.

b. PM

- 1) Regulation 7.08 does not require any specific monitoring requirements for PM, however, Regulation 2.16, section 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.
- 2) The District preformed a onetime compliance demonstration for PM and the standard cannot be exceeded controlled assuming 95% control efficiency for the controls.

c. Opacity

Regulation 7.08 does not require any specific monitoring requirements for opacity, however, Regulation 2.16, section 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure compliance with the terms and conditions of the permit.

iv. Reporting**a. VOC**

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

b. PM

Regulation 7.08 does not require any specific reporting requirements for PM, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

c. Opacity

Regulation 7.08 does not require any specific reporting requirements for opacity, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

p. Emission Unit U-32 – Blank Wash Process Operation

i. Equipment:

U-32 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-156	Drum Loading	7.08	For Regulation 7.08 the equipment is subject to PM emission standard and was installed after September 1, 1976
E-157	1,200 gallon Tank	7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-158	2,500 gallon Tank	7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E-159	Two (2) 5,000 gallon Tanks	7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.

ii. Standards/Operating Limits

a. VOC

- 1) Regulation 7.12, section 3.3 requires submerged fill if the materials have an as stored vapor pressure of 1.5 psia or greater. Regulation 7.12 applies due to the size of the tanks, however, since the vapor pressure as stored is less than 1.5 psia there are no applicable emission or equipment standards.
- 2) Per Regulation 2.05, the 10-year actuals VOC PAL limit was determined by adding the baseline actual emissions from 2000/2001 (881.35) to the PSD significance level for VOC emissions (39) resulting in 920.35 tons per year.

b. PM

- 1) The PM limits are calculated per Regulation 7.08, section 3.1.2. The equation to calculate the emission limits is $E = 3.59P^{0.62}$, where P is expressed in tons/hr.

- 2) Per Regulation 2.05, the 10-year actuals PM/PM₁₀ PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.6) to the PSD significance level for PM/PM₁₀ emissions (14.9) resulting in 50.5 tons per year PM/PM₁₀.
- 3) Per Regulation 2.05, the 10-year actuals PM_{2.5} PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.15) to the PSD significance level for PM/PM_{2.5} emissions (9.9) resulting in 45.05 tons per year PM/PM₁₀.

c. **Opacity**

Regulation 7.08, section 3.1.1. establishes an opacity standard of less than 20%.

iii. **Monitoring and Record Keeping**

Emissions Calculation Methodology: The VOC storage tanks emissions are based upon the VOC content of the stored material and the amount of material in the tank.

a. **VOC**

Regulation 2.16, section 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records of the content of the listed VOC storage tank is necessary to accurately estimate annual VOC emissions.

b. **PM**

Regulation 7.08 does not require any specific monitoring requirements for PM, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 7.08 does not require any specific monitoring requirements for opacity, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring

and record keeping to assure compliance with the terms and conditions of the permit.

iv. **Reporting**

a. **VOC**

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit. There are no Emission Unit specific compliance reporting requirements for the tanks. The source is required to report the throughput for purposes of demonstrating ongoing compliance with the plant-wide PAL VOC emission limit.

b. **PM**

Regulation 7.08 does not require any specific reporting requirements for PM, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

c. **Opacity**

Regulation 7.08 does not require any specific reporting requirements for opacity, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

q. **Emission Unit U-34 – Natural Gas-Fired Combustion Equipment - Non-Boiler**

i. **Equipment:**

U-34 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-25	Fifteen (15) Natural Gas-Fired “Bigfoot” heating Units (20 MMBtu/hr each)	7.08	For Regulation 7.08 the equipment is subject to PM emission standard and was installed after September 1, 1976
		6.42	Reasonable Available Control Technology Requirements for Major Volatile Organic Compound

ii. Standards/Operating Limits**a. PM**

- 1) The PM limits are calculated per Regulation 7.08, section 3.1.2. The equation to calculate the emission limits is $E = 3.59P^{0.62}$, where P is expressed in tons/hr.
- 2) Per Regulation 2.05, the 10-year actuals PM/PM₁₀ PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.6) to the PSD significance level for PM/PM₁₀ emissions (14.9) resulting in 50.5 tons per year PM/PM₁₀.
- 3) Per Regulation 2.05, the 10-year actuals PM_{2.5} PAL limit was determined by adding the baseline actual emissions from 2000/2001 (35.15) to the PSD significance level for PM/PM_{2.5} emissions (9.9) resulting in 45.05 tons per year PM/PM₁₀.

b. Opacity

Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%.

c. NO_x

- 1) Regulation 7.08, section 4.1. requires that the source shall not allow NO_x emissions to exceed 300 ppm by volume expressed as NO₂.
- 2) To avoid the RACT requirements of District Regulation 6.42 for major NO_x-emitting sources, Ford has requested a 99 ton per year on emissions of this pollutant.

iii. Monitoring and Record Keeping

Emissions Calculation Methodology: The calculated emissions are based upon natural gas and usage with the emissions factor for natural gas coming from AP-42.

a. **PM**

Regulation 7.08 does not require any specific monitoring requirements for opacity, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

b. **Opacity**

Regulation 7.08 does not require any specific monitoring requirements for opacity, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

c. **NO_x**

1) The District has performed a one-time NO_x compliance demonstration using AP-42 emission factors and combusting natural gas, and the emission standard cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to NO_x emission limits.

2) Regulation 2.16, section 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records of NO_x emissions must be retained to ensure compliance with the plant-wide 99 ton NO_x emission limit. The NO_x emissions can be determined by measuring the fuel throughput.

iv. **Reporting**

a. **PM**

Regulation 2.16, section 4.1.9.3 requires sufficient reporting requirements to assure compliance with the terms and conditions of the permit.

b. **Opacity**

Regulation 2.16, section 4.1.9.3 requires sufficient reporting requirements to assure compliance with the terms and conditions of the permit.

c. **NO_x**

Regulation 2.16, section 4.1.9.3 requires sufficient reporting requirements to assure compliance with the terms and conditions of the permit.

r. **Emission Unit U-35 – Emergency Generators**i. **Equipment:**

U-35 Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E-26	Ten (10) Backup Emergency Generators for Emergency Power (6 at 82 HP each, 1 at 122 HP, 1 at 173 HP, 1 at 207 HP and 1 at 244 HP) and three (3) Diesel Fire Pumps	1.09	Prohibition of Air Pollution
		40 CFR 63 Subpart ZZZZ	Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
		40 CFR 63 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
		40 CFR 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

This equipment is subject to 40 CFR Part 63 Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, because it involves an existing RICE located at an major source of HAP emissions, but the compliance date is May 3, 2013.

ii. **Standards/Operating Limits**a. **Unit Operations**

Regulation 40 CFR 63 Subpart ZZZZ requires periodic maintenance which includes changing the oil and filter, inspecting the air cleaner, and inspecting hoses and belts per Table 2c.

b. **HAP**

Per Regulation 5.02, section 4.87, the source is subject to 40 CFR 63, Subpart ZZZZ. Also the source is subject to 40 CFR 60, Subpart IIII and 40 CFR 60, Subpart JJJJ.

iii. **Monitoring and Record Keeping**

Emissions Calculation Methodology: The calculated emissions are based upon diesel fuel and usage with the emissions factor for diesel fuel coming from AP-42.

a. **Unit Operation**

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

b. **HAP**

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

a. **Unit Operation**

There are no compliance reporting requirements for this equipment, however Regulation 2.16, section 4.1.9.3 requires sufficient reporting requirements to assure compliance with the terms and conditions of the permit.

b. **HAP**

Regulation 2.16, section 4.1.9.3 requires sufficient reporting requirements to assure compliance with the terms and conditions of the permit.

III. Other Requirements

1. **Temporary Sources:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Emissions Trading:** N/A
4. **Operational Flexibility:** The source did not request any operational flexibility for this equipment.

5. Compliance History:

Incident Date(s)	Regulation Violated	Result
8/3/1995	1.05	Settled
4/12/1999	7.08	Settled
7/21/2004	2.16	Board Order
7/21/2004	2.16	Board Order

6. Insignificant Activities:

Insignificant Activities		
Description	Quantity	Basis
Direct heat exchangers < 1 MM Btu/ hr	350	Regulation 2.02, Section 2.1.1
Internal combustion engines fixed or mobile	115	Regulation 2.02, Section 2.2
Brazing, soldering or welding equipment	1.8 Billion welds/yr	Regulation 2.02, Section 2.3.4
Woodworking, except for conveying, hogging, or burning wood/sawdust	1	Regulation 2.02, Section 2.3.5
Lab venting and exhaust systems (non radioactive materials)	3	Regulation 2.02, Section 2.3.11
Ventilation systems - bakeries & restaurants	1	Regulation 2.02, Section 2.3.12
Portable diesel or gasoline storage tanks	6	Regulation 2.02, Section 2.3.23
Storage tanks – Diesel or fuel oil – Not for sale, resale or distribution	3	Regulation 2.02, Section 2.3.24
Closed pressure storage vessels	100	Regulation 2.02, Section 2.3.26
Wastewater Pretreatment system.	1	Emissions insignificant
Cooling Towers	8	Less than 5 tpy
Portable tote tanks and containers for raw material and/or waste shipment and storage	Various	Regulation 2.16, Section 1.23.1.2
Process Day Tanks	Various	Regulation 2.16, Section 1.23.1.2

Insignificant Activities		
Description	Quantity	Basis
Chemical Storage Tanks	30,000 gal Urea, (2) 550 Gal Diesel for Fire Pumps, 6000 Gal, Used Oil, 11,000 Gal. Ferric Chloride, 6500 Gal Polymer, (4) 1000 Gal. Booth Chemical/Polymer and Misc. Empty Chemical Storage Tanks, 500 Gal Booth Chemical Tank and 500 Gal Diesel Fire Pump Fuel Tank	Regulation 2.16, Section 1.23.1.2
Fluid Fill (e.g. Hydraulic Fluids, Oils, Antifreeze, Lubricating Fluids, Refrigerant)	Various	Regulation 2.16, Section 1.23.1.2
Trash Baling Activity	N/A	Regulation 2.16, Section 1.23.1.2
Stamping Plant Activities (Blank Wash, etc.)	Various	Regulation 2.16, Section 1.23.1.2
Paved and Unpaved Roads and Lots including Temporary Construction Access Roads	Various	Regulation 2.16, Section 1.23.1.2
Waterborne Cold Cleaners	Various	Emissions insignificant
1000 Gallon Gasoline Storage Tank	1	Regulation 7.15
Phosphate Cleaning System	1	Emissions insignificant
Paint Sludge System	1	Emissions insignificant
Paint Kitchen	1	Accounted for at Coating Line
Panel test Spray Booth	1	Emissions insignificant

- a. Insignificant Activities are only those activities or processes falling into the general categories defined in District Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
- b. Activities identified In District Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source.
- c. For all insignificant activities that emit regulated air pollutants for which the company has accepted a plant-wide synthetic minor limit, the company shall maintain sufficient records to calculate the emissions and report those emissions

in the semi-annual compliance reports and the annual emissions inventory report.

- d. The Insignificant Activities table is correct as of the date the permit was proposed for review by the USEPA, Region 4. The company shall submit an updated list of insignificant activities annually with the Title V compliance certification pursuant to District Regulation 2.16, section 4.3.5.3.6.